

# Fact Sheet



## *For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act*

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the original Fact Sheet corresponding with the issuance of the initial Title V operating permit issued on June 3, 2003.

Permit Number: **R30-04900019-2003**

Application Received: **September 19, 2005 and February 27, 2007**

Plant Identification Number: **03-54-04900019**

Permittee: **Consolidation Coal Company**

Facility Name: **Loveridge Preparation Plant**

Mailing Address: **P.O. Box 100, Osage, WV 26543**

Permit Action Number: *SM01*; Revised: *May 22, 2007*

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Physical Location:	Fairview, Marion County, West Virginia
UTM Coordinates:	561.6 km Easting • 4,383.9 km Northing • Zone 17
Directions:	Approximately 1 mile NW of Fairmont on State Road 17 then left on Sugar Run Road to the Loveridge Preparation Plant

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### **Facility Description**

Coal Preparation Plant with Thermal Dryer.

This significant modification includes the following changes:

- covered by Permit R13-0760A - addition of raw coal Conveyor 21 (Emission Unit 052), a second stacking tube at raw coal Stockpile 1, and raw coal reclaim belt Conveyor 22 (Emission Unit 053). The base area of raw coal Stockpile 1 (Emission Unit 003A) will remain at 9.55 acres, although the capacity will be increased from 300,000 tons to 450,000 tons.

- covered by Permit R13-0760B - addition of feed Conveyor 7A (Emission Unit 030A), a 10,500 ton Clean Coal Silo #3 (Emission Unit 044A), and reclaim Conveyor 13A (Emission Unit 031A). Also,

railroad loadout Conveyor 8 and Conveyor 9 are upgraded from 60-inch belts to 72-inch belts, but the maximum throughput rates remain at 3,000 TPH and 18,000,000 TPY.

- covered by Permit R13-0760C - revision of emission rates of NO<sub>x</sub>, CO and VOC for the Thermal Dryer (in accordance with CO-R13, 14-96-22). Emission limits for NO<sub>x</sub>, CO and VOC in the initial R13-0760 Permit were established as a result of use of erroneous emission factors and were technically infeasible to achieve. The company entered into the Consent Order CO-R13, 14-96-22 with DAQ on July 19, 1996 to resolve this issue, as well as an issue with the SO<sub>2</sub> emissions rates and sulfur content. At this time new emission rates of NO<sub>x</sub>, CO and VOC are established based on stack testing, and set forth in the Permit R13-0760C. New SO<sub>2</sub> emission rates and sulfur content are still to be determined. After this happens, the Consent Order requirements will be satisfied in full. Also, Refuse Bin 2 (Emission Unit 027A) was added.

### Emissions Changes Summary

Criteria Pollutants	Potential Emissions Changes, TPY
Carbon Monoxide (CO)	-262.2*
Nitrogen Oxides (NO <sub>x</sub> )	18
Particulate Matter (PM <sub>10</sub> )	2.5
Total Particulate Matter (TSP)	5.3
Volatile Organic Compounds (VOC)	192.2

\* The only source of CO emissions at the plant is Thermal Dryer1/Furnace1 (Source ID 045A, 045C), therefore its PTE for CO should be treated as facility-wide PTE. Based on the results of several stack testings of the Thermal Dryer1/Furnace1 (as per Consent Order # CO-R13, 14-96-22), it was found that CO emission limit of 14.1 lbs/hr set forth in Permit R13-0760 was technically infeasible to achieve as was described above. Per the Consent Order Compliance Program, the limit was revised to 57.6 lbs/hr and 172.8 TPY via R13-0760C Permit. On the other hand, in the initial Title V Permit Fact Sheet facility-wide PTE for CO was shown as 435 TPY based on the Title V Application information. Therefore, PTE for CO number decreased as the result of this modification (172.8 TPY - 435 TPY = - 262.2 TPY), although no actual CO emission reduction took place.

### Title V Program Applicability Basis

With this change this facility maintains its potential to over 100 tons per year of CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and VOC's, and is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

### Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Permits For Construction, Modification, Relocation and Operation of Stationary Sources of
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Air Pollutants, Notification Requirements,  
Administrative Updates, Temporary Permits,  
General Permits, and Procedures for Evaluation.  
45CSR30 Operating permit requirement.

State Only: N/A

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

#### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-0760A	May 2, 2006	
R13-0760B	September 14, 2006	
R13-0760C	December 21, 2006	
CO-R13, 14-96-22	July 19, 1996	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

#### Determinations and Justifications

1. Emission Units Table 1.0 - "Associated Emission Points" column in the table was renamed to "Associated Transfer Points", and "T" was added in front of all the Transfer Points IDs.
2. Requirement 4.4.3. - a typo was corrected changing a reference to Requirement 4.1.8., not Requirement 4.1.9.
3. Requirements 4.6.1., 4.6.2. and 4.6.3. were deleted because they were satisfied by the time of this Permit modification.

#### Non-Applicability Determinations

No non-applicability determinations were conducted with this permit revision.

### **Request for Variances or Alternatives**

None

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: April 6, 2007

Ending Date: May 21, 2007

All written comments should be addressed to the following individual and office:

Natalya Chertkovsky  
Permit Engineer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Point of Contact**

Natalya Chertkovsky  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1220 • Fax: 304/926-0478

### **Response to Comments**

No comments were received.